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*Of Attorneys for Defendants*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**STEVEN HAYES, as personal  
representative of the estate of QUANICE  
HAYES, deceased, AND VENUS HAYES,**

**PLAINTIFFS,**

**v.**

**CITY OF PORTLAND, a municipal  
corporation, and ANDREW HEARST,**

**DEFENDANTS.**

**3:18-cv-00988-AC**

**DEFENDANTS' *UNOPPOSED* MOTION  
FOR EXTENSION OF TIME FOR  
COMPLETION OF EXPERT  
DISCOVERY, FILING OF JOINT ADR  
REPORT, AND FILING OF  
DISPOSITIVE MOTIONS**

Pursuant to Rule 6(b) of the Fed. R. Civ. P., Defendants City of Portland and Andrew Hearst ("Defendants") move this Court for an extension of time for the dates listed in Order

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Granting Motion to Extend Deadlines entered by the Court on January 13, 2020 [ECF 87]. Counsel for Defendants has conferred with counsel for Plaintiffs, Jesse Merrithew. Plaintiffs consent to this motion. Specifically, Defendants request an order:

1. Allowing an extension of time from April 3, 2020, up to and including July 3, 2020, to complete expert discovery;
2. Allowing an extension of time from April 10, 2020, up to and including July 10, 2020, to file Joint ADR Report; and
3. Allowing an extension of time from June 5, 2020, up to and including September 4, 2020, to file all dispositive motions.

This motion is based upon the complete court file and upon the Declaration of William W. Manlove, filed herewith.

Dated: April 3, 2020

Respectfully submitted,

/s/William W. Manlove  
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